



U.S. Department of Housing and Urban Development
Washington, D.C. 20410

OFFICE OF PUBLIC AND INDIAN HOUSING REAL ESTATE ASSESSMENT CENTER

Inspector Notice No. 2021-02

TO: Real Estate Assessment Center (REAC) Inspectors

FROM: James E. Cunningham
Inspector Administration (IA)

SUBJECT: Amendment to Coronavirus (COVID-19) Inspection Guidance

DATE ISSUED: August 10, 2021

EFFECTIVE DATE: August 10, 2021

This is an update notice and supersedes Inspector Notice No. 2020-01. The changes define the guidance for COVID-19 related inspection requirements for Uniform Physical Condition Standards (UPCS) and for the National Standards for the Physical Inspection of Real Estate (NSPIRE) Demonstration and related NSPIRE inspections. This guidance is effective until amended, superseded, or rescinded.

Applicability

The requirements in this notice apply to all physical inspections conducted by REAC's federal, contract, and related inspectors (hereafter referred to as "REAC Inspectors") including those inspectors paid for by financial and physical assessment appropriations. This notice applies to all property types subject to REAC inspections, including HUD-assisted and insured properties in accordance with 24 CFR 5.701 and 24 CFR 266.507. NSPIRE demonstration and related inspections are also included.

REAC's Return to Operations (RTO)

Effective June 1, 2021, REAC will expand its inspections in support of the prioritized backlog of inspections. REAC Inspectors will follow CDC recommended guidance for travel, social distancing, the use of hand-sanitizer, and the wearing of appropriate personal protective equipment (PPE) (e.g., wearing face masks) throughout an inspection.

Procedures

This notice requires REAC Inspectors to adhere to the following procedures:

1.0 Pre-Inspection Clarification:

- 1.1 Properties will be notified at least 28 days prior to their inspection. The 28-day notification will remain in effect until September 30, 2021. In addition, the REAC Inspector will call and provide written notification to the Public Housing Agency (PHA) and/or property owner agent (POA) 14 days prior to the inspection date. This additional temporary 28-day notification is being implemented to ensure the safety of the inspectors, residents, and property staff. For the purposes of the NSPIRE Demonstration, the Contractor conducting the inspections on REAC’s behalf shall follow the 28-day and 14-day notification guidance; however, if at the time of the initial or follow-on notification a property indicates that an earlier “mutually agreeable” date is acceptable, the inspection can occur on that date. Prior to the inspection, the REAC Inspector will ask if there are any known COVID-19 case(s) on the property. If positive case(s) are reported by the PHA or POA, the REAC Inspector shall:
 - 1.1.1 Inform the Technical Assistance Center (TAC) (888) 245-4860 to obtain a case number. For NSPIRE Demonstration inspections, the inspector shall call 1-800-883-1448 to obtain a case number.
 - 1.1.2 Send an email notification to Covid19inspectioninquiry@hud.gov.
 - 1.1.3 A second call shall be made two (2) working days prior to the inspection. The REAC Inspector will re-confirm with the PHA or POA there are no known cases of COVID-19. If a positive case is reported, the REAC inspector shall follow the guidance listed in 1.1.1.
 - 1.1.4 On inspection day, if a unit in the inspection sample has a known COVID-19 case, the REAC Inspector shall replace with an alternate unit as required by the inspection protocol.
- 1.2 REAC Inspectors are required to inspect properties that are deemed as priority inspections by HUD until further notice.
- 1.3 REAC Inspectors shall follow CDC’s recommendations on domestic travel during COVID-19 for both Not Vaccinated and Fully Vaccinated persons (see below):

Domestic Travel Recommendations & Requirements	Not Vaccinated	Vaccinated
Get tested 1-3 days before travel	X	
Get tested 3-5 days after travel and self-quarantine for 7 days. Self-quarantine for 10 days if not tested.	X	
Self-monitor for symptoms	X	X
Wear a mask and take other precautions during travel	X	X

The above information is located on the CDC website:
<https://www.cdc.gov/coronavirus/2019-ncov/travelers/travel-during-covid19.html>

2.0 Inspection Protocol Clarifications:

- 2.1 Personal Protective Equipment (PPE) is required to be worn throughout all phases of the

inspection process. At a minimum, a properly fitting mask must be worn throughout the inspection, even if local requirements are less stringent. For details on acceptable masks, please use this link for masking guidance:

<https://www.cdc.gov/coronavirus/2019-ncov/prevent-getting-sick/types-of-masks.html>

For property inspections with an elderly population, a face shield is also required. To review on how to wear a mask the “right way,” refer to

<https://www.cdc.gov/coronavirus/2019-ncov/easy-to-read/diy-cloth-face-coverings.html>

that outlines the following steps:

1. First, wash your hands.
 2. Put the mask on your face.
 3. Put the loops behind your ears.
 4. The mask must cover your nose.
 5. The mask must cover your mouth.
 6. The mask must fit under your chin.
 7. The mask must be snug on your face.
 8. Make sure breathing is easy.
- a. For washing hands, use the recommended CDC guidance:**
- (1) Wet hands with clean, running water (warm or cold), turn off the tap, and apply soap.
 - (2) Lather hands by rubbing them together with the soap. Lather the backs of your hands, between your fingers, and under your nails.
 - (3) Scrub hands for at least 20 seconds.
 - (4) Rinse hands well under clean, running water.
 - (5) Dry hands using a clean towel or air dry them.
- b. Using a sanitizer:** Use an alcohol-based hand sanitizer containing at least 60% alcohol if soap and water are not available.
- (1) Apply the gel product to the palm of one hand (read the label to learn the correct amount).
 - (2) Rub hands together.
 - (3) Rub the gel over all the surfaces of hands and fingers until hands are dry. This should take around 20 seconds.
- c. Additional guidance and information on key COVID-19 items may be found below:**
- (1) Proper procedures for wearing a mask can be viewed at the CDC website by clicking <https://www.cdc.gov/mmwr/volumes/70/wr/mm7007e1.htm>.
 - (2) Review the CDC Guidance for In-Home Service regarding disinfecting and cleaning different surfaces at <https://www.cdc.gov/coronavirus/2019-ncov/prevent-getting-sick/disinfecting-your-home.html>.
 - (3) CDC Guidance on “When You Can be Around Others” <https://www.cdc.gov/coronavirus/2019-ncov/if-you-are-sick/end-home-isolation.html> provides guidance about the length of isolation periods for ill persons, and quarantine periods for persons exposed to COVID-19. Additionally, the link at <https://www.cdc.gov/coronavirus/2019-ncov/symptoms-testing/coronavirus-self-checker.html> provides a

Coronavirus Self-Checker that is an interactive clinical assessment tool to assist individuals on deciding when to seek testing or medical care if they suspect they or someone they know has contracted COVID-19 or has come into close contact with someone who has COVID-19.

- (4) All inspectors must review the COVID-19 FAQs PPE/ guidance at <https://www.cdc.gov/coronavirus/2019-ncov/faq.html> . Topics include the proper use of alcohol-based hand sanitizer.

- 2.2 Before entering each unit for inspection, the REAC Inspector shall clean his/her hands. While conducting the inspection, the inspector will refrain from placing inspection equipment/tools on high touch surfaces and objects such as kitchen countertops, tables, and other furniture. Any equipment that makes contact with a high touch surface will require cleaning upon completing that unit’s inspection as per CDC guidance on high touch surfaces (<https://www.cdc.gov/coronavirus/2019-ncov/community/schools-childcare/clean-disinfect-hygiene.html>). The REAC Inspector shall dispose of his/her used cleaning materials in property designated trash containers outside of the units. For questions concerning PPE please see <https://www.cdc.gov/coronavirus/2019-ncov/hcp/using-ppe.html>
- 2.2.1 REAC Inspectors shall avoid physical contact greetings, for example, handshakes.
- 2.2.2 REAC Inspectors shall keep indoor conversations focused on the inspection itself.
- 2.2.3 REAC Inspectors shall follow CDC guidance on sanitizing hands and equipment. Wearing gloves is mandatory for conducting inspections in senior/elderly residential and/or health care facilities. For all other types of properties, wearing gloves is now optional per CDC guidance (<https://www.cdc.gov/coronavirus/2019-ncov/prevent-getting-sick/gloves.html>)
- 2.2.4 Due to the number of people entering the unit for inspection, inspectors shall encourage PHA staff, Property Owners/Agents (POAs), and residents to open windows for ventilation. Please refer to <https://www.cdc.gov/coronavirus/2019-ncov/community/ventilation.html>
- 2.2.5 REAC Inspectors shall not dispose of any PPE in a dwelling.
- 2.3 Social Distancing - A REAC Inspector shall maintain social distancing throughout the entire inspection. In units, this requirement limits the number of escorts to one (1) PHA or POA member.
- 2.3.1 If resident(s) elect to stay for the inspection, the REAC Inspector and PHA or POA representatives should follow proper social distance protocols. If proper social distances cannot be maintained, the REAC Inspector shall not enter or shall leave the unit.
- 2.3.2 If proper social distances cannot be maintained and the unit cannot be safely inspected, REAC Inspectors shall mark the unit in their inspection device as uninspectable (e.g., Resident Refusal), and proceed to an alternate unit.
- 2.4 Sample Size – if the required sample cannot be met, the REAC Inspector shall process the inspection as “Sample Not Met” per the inspection protocol and notify TAC and obtain a TAC Number. For NSPIRE Demonstration inspections, the Contractor shall call NSPIRE Demonstration technical assistance at 1-800-883-1448. Inspectors should make every effort to work with the POA to ensure the sample size is met.
- 2.5 Re-confirmation of possible cases – if the inspection occurs over more than one-day, re-confirm with the PHA or POA at the start of each day there have been no new COVID-

19 cases that could impact the inspection. If there is a case of COVID-19 reported during the inspection period tied to a unit in the sample, the REAC Inspector shall select an alternate unit.

3.0 Post Inspection COVID-19 Guidelines:

- 3.1 Inspectors will conclude their inspection in accordance with the inspection protocol.
- 3.2 After leaving the property, REAC Inspectors shall dispose of used PPE and cleaning material as outlined in section 2.2.
- 3.3 Per section 2.0 above, inspectors must complete health checks per CDC recommendation, please refer to: <https://www.cdc.gov/coronavirus/2019-ncov/symptoms-testing/coronavirus-self-checker.html> for every post inspection to help make decisions on when to seek testing and medical care should the need arise.

4.0 COVID-19 Testing Prior to Inspections:

- 4.1 REAC is retaining the 30-day COVID-19 testing requirement for unvaccinated REAC Inspectors as defined in previous Inspector Notice 2020-01 issued September 29, 2020.
- 4.2 Per this notice, REAC will conform to CDC guidelines in its inspection protocol and waive the testing requirement for COVID-19 for fully vaccinated persons prior to and after travel, and prior to conducting physical inspections.
- 4.3 An unvaccinated inspector shall maintain proof of their latest test result and may be required to show proof that he or she fulfilled HUD's testing requirement the day of an inspection.
- 4.4 REAC inspectors are prohibited from conducting an inspection after testing positive for COVID-19 until the inspector tests negative following a positive result.
- 4.5 If required by the PHA or POA, all REAC inspectors shall submit to an on-site temperature check.

Administration

REAC will continue to collaborate with headquarters and field offices throughout CY 2021 to further identify program needs and evaluate the effectiveness of our methodology and inspection protocol. This protocol will be revised and updated regularly to the latest CDC recommendations and guidance. REAC will perform ongoing, regular re-evaluations and validations of the properties receiving 28-day notices until September 30, 2021; and inspectors will be notified if the status of the scheduled inspection changes due to safety concerns. If a property is in an area that experiences an increase in cases after the notification, the REAC Inspector shall contact TAC for further guidance. Inspectors conducting NSPIRE Demonstration inspections shall call 1-800-883-1448. When in doubt, inspectors are directed to follow CDC guidance. For questions regarding this notice, please contact the Technical Assistance Center (TAC) at 1-888-245-4860 or via email (REACTAC@HUD.gov).